

From: **Alex Sabine**  
Sent: 24 February 2020 15:58  
To: Licensing <[licensing@iow.gov.uk](mailto:licensing@iow.gov.uk)>  
Subject: 20/00148/GAAGCN/GA05

Dear Sir or Madam,

Re: Application for an adult gaming centre at Harbourslights Amusement/Peter Pan

I wish to register strong opposition to allowing an adult gaming centre in this family friendly leisure and child play area of Ryde Esplanade.

This is a Victorian seaside town historically and although we do appreciate the importance of recreation for young people, financial gambling is incredibly toxic and would exacerbate issues of deprivation and relative poverty in this area. Gambling addiction is now noted in the DSM V as recognised mental illness and is also recognised by the NHS. Why would we choose to promote these institutions into the 21st century when we have enough of a gamble with our ecology and our diminishing economy?

I would not be opposed to recreational activities similar to those already in place but out-and-out gambling would be, in our view, an incredibly distasteful addition to this area of Ryde.

Sincerely,

Alex Sabine

Monkton Street  
Ryde

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From: **Ann Pearson**  
Sent: 02 March 2020 14:28  
To: Licensing <[licensing@iow.gov.uk](mailto:licensing@iow.gov.uk)>  
Subject: Gambling licence for Peter Pan Playground

Dear Sirs,

I wish to register my strong objection to the above application. The title gives the clue - to put an adult gambling facility into a children's playground is completely unacceptable in terms of the message it sends to the children using the playground and the adults accompanying them.

If the council is serious about its published intentions for regeneration in Ryde, it is important that it pursues the aim of making our town an attractive family holiday destination as well as a better place to live. The national problems with gambling addiction and of under age gambling are well documented. To contemplate putting this facility into an area of high deprivation and of failing to protect children from exposure to such an activity would seem both undesirable and irresponsible.

Kind regards,

Ann Pearson  
Nelson Place  
Ryde

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From: **Jenny Wade**

Sent: 23 February 2020 16:06

To: Licensing <licensing@iow.gov.uk>

Subject: 20/00148/GAAGCN/GA05 - Adult Gaming Centre, Harboursight Amusements, Peter Pans Funfair & Amusements, 23 The Esplanade, Ryde, PO33 2DZ.

Dear Sir or Madam,

I wish to register my opposition to allowing an Adult Gaming Centre to be introduced at the above **children's play area**. In my opinion this is not the right setting for an adult gaming centre to be created/established. It will create completely the wrong impression in innocent, impressionable and fertile young minds that adult gaming machines and gambling is "fine" even within the confines of their own safe play environment.

Gambling addiction is a very real blight, affecting scores of families in this country and throughout the world, and ruining family lives - often leaving children and spouses poverty stricken, homeless and affected by the repercussions of poverty and broken family life for the rest of their lives!

Ryde esplanade is currently a place where people can go without worry or fear of 'happening upon' this sort of establishment. Please keep it this way for future generations to enjoy in the *innocent* way it has always been enjoyed.

The town of Ryde is on the cusp of many wonderful things, please do not cast a long shadow on the regeneration and rejuvenation plans for the esplanade (which so many have worked so hard to bring to fruition) by granting permission to this licencing application.

Yours faithfully,

Jenny Wade (Mrs).

Great Preston Road,  
Ryde

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From: **Sharon Riley**

Sent: 02 March 2020 08:00

To: Newport Help Centre <[Newport.HelpCentre2@IOW.GOV.UK](mailto:Newport.HelpCentre2@IOW.GOV.UK)>

Subject: Peter Pan, Ryde -Adult Gaming

I live in Ryde. I have been informed that there is a licence application for Adult Gaming at this site. I object most strongly. This is a children's fun fair. Children come with their families in their thousands, to go to the beach, eat ice creams, play in the fun fair etc. They do not need adult gaming facilities. There is a real issue these days with addiction to gambling. Ryde suffers from deprivation and we do not need more adult gaming sites. It is immoral. Please refuse a licence in this case.

Many thanks, Sharon Riley.

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Name: **Helen Keogan**

Vernon Square, Ryde

Comment Reasons – Children, Crime, Nuisance, Safety

It is hard to think of a more inappropriate place for an Adult Gaming Centre. A children's playground. This presents too many risks, for children and families, teenagers in the Skatepark and the many vulnerable adults in Ryde. The lure of cash on the premises only increases the possibility of crime ,not only within the buildings but also to people in the vicinity.

From: **Mo Kennedy Martin**  
Sent: 23 February 2020 19:52  
To: Licensing <licensing@iow.gov.uk>  
Subject: 20/00148/GAAGCN/GA05

Dear Sir or Madam,

Re: Application for an adult gaming centre at Harbourside Amusement/Peter Pan

I wish to register strong opposition to allowing an adult gaming centre in this family friendly leisure and child play area of Ryde Esplanade. On every level of common sense, it is a preposterous proposal.. It will change the whole ambience of the area and attract a wide clientele who could be detrimental to the general public and particularly to the children. Apart from the Peter Pan play area there are cafes, an ice cream parlour, typical seaside shops, a popular walkway along the marina and access to the beach and skatepark. It is unified whole of the kind of regeneration that we in this town are working so hard to achieve in line with the IOW Council's Core Strategy and the Ryde Town Plan's proposals to make Ryde a better place to live.. The thought of a gambling premise in that closed in area during the summer months is deeply worrying.

But most of all, the threat to children is paramount. The IOW COUNCIL'S GAMBLING ACT STATEMENT OF PRINCIPLES is specific about protecting children from adult gaming in accordance with the Gambling Commission's own stated responsibility in issuing licenses where children might be harmed. I quote (3.9) "This licensing objective intends to prevent children and young persons from taking part in, OR BEING IN CLOSE PROXIMITY TO, gaming...Such measures may include.CAREFUL CONSIDERATION OF THE SITING OF CASH MACHINES. Further, (3.14) The Licensing Authority will consider ..... in particular, how they will protect children and PREVENT THEM FROM BEING IN CLOSE PROXIMITY TO GAMBLING.

The Council must consider that it is not just the venue that is of concern, but the knock-on effect of its presence in Ryde. It is well understood that such a premise attracts truancy. Young people under 18 will willingly lie about their age and who will contradict them. There will be further obligations on our stretched-to-the-limit police.

I respectfully request that the Council read it's own Gaming Act Principles and decide whether they can ignore the danger to children in close proximity to adult gaming in a such a location.

Sincerely,

Maureen Martin  
Monkton Street  
Ryde

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### **Ryde Society**

The Ryde Society is not specifically opposed to gambling, but objects strongly to this application for an adult gambling centre in a children's playground, on the basis that it appears not to meet any of the Licensing Objectives laid down in current legislation, including the IOWCC's own Gambling Policy document<sup>1</sup>.

The application appears to be incomplete – there is no risk assessment – and inaccurate – 23 The Esplanade is a private house.

An Adult Gaming Centre (AGC) is an arcade licensed by the Gambling Commission comprising a limited number of B3 and B4 machines and an unlimited number of category C and D machines. No one under the age of 18 is allowed to enter.

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<sup>1</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf>

The IOWCC is shown to have made no pre-planned inspections to check that people under 18 are not entering such premises in a 2020 Gambling commission report<sup>2</sup>. It is therefore unlikely to be checked to see if young people and children are entering.

The Ryde society asks **that this application be refused** for the following reasons:

#### Protection of Children from harm.

It is part of a trend for gambling to be available in places that are seen as 'family friendly', but it is a dangerous trend and one that seriously affects public health. This trend is already visible in the Bowling Alley next door. The AGC is accessed through the funfair<sup>3</sup>.

Children and young people are more vulnerable to gambling-related harms and the harms they experience are likely to have a large impact both now and in the future. Gambling addiction is a serious health hazard.

The licensing legislation recognises that starting to gamble early is one of the risk factors for becoming a problem gambler in adulthood. Children are not protected from gambling addiction, it does not form part of the National Curriculum as addiction to alcohol or drugs do. It is therefore the responsibility of the community and those who represent us on the Town and County councils to protect young people.

Given that around 15% of 11 – 15 year olds are reported to have gambled in the last week, and it is estimated that 2% of 11 – 15 year olds are problem gamblers<sup>4</sup>, the proposal to put an adult gambling venue in the Peter Pan playground is completely irresponsible and against current legislation and the Isle of Wight Council's own Gambling policy<sup>5</sup> which states: *The Licensing Authority will pay particular attention to applications where access to the licensing premises is through other premises and will consider whether or not children can gain access; the compatibility of the two establishments and its ability to comply with requirements of the Gambling Act.* The Policy also states: *if they seek to develop multi-purpose developments and in particular consider how they will protect children from being harmed by gambling as well as preventing children from being in close proximity to gambling.*

Over half (51%) of the child gamblers who reported having gambled in the last week had gained access to a venue where legally, they should not have been<sup>6</sup>. Given that the IOWCC appears not to check, (see note 1), this is important.

It is the duty of the people in positions of responsibility, like councillors to take action which keeps children safe, and to reduce the hazards that might impair children's ability to grow up safely. Gambling is one of the hazards.

It is also the duty of the applicant to clarify how they will keep children safe. There is no risk assessment or such clarification attached to the application.

#### Protection of vulnerable people<sup>7</sup> from harm

The location in which the proposal sits is one of the most deprived socially and economically in the UK<sup>8</sup>. This part of Ryde to the East of the bottom of Union Street is a centre of poverty and social deprivation. Gambling addiction is a known problem in this kind of environment. While this may not be relevant, there is already an overprovision of gambling opportunities in the area – including the Bowling Alley next door, Arcadia and numerous betting shops in Union Street.

Gambling is the fastest growing UK addiction.

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<sup>2</sup> <https://www.gamblingcommission.gov.uk/PDF/survey-data/Licensing-authority-statistics-revised-january-2020.pdf>

<sup>3</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf>  
Section 5.13

<sup>4</sup> <https://parentzone.org.uk/article/gambling-and-children-problem>

<sup>5</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf>

<sup>6</sup> <https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019.pdf>

<sup>7</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf> section 5.10

<sup>8</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf> 7.6 B - 27

Gambling destroys lives, it does not enhance them. Actions that might potentially be harmful to children and young people, and to vulnerable adults, now or in the future, should be avoided unless there is evidence that proves they are not harmful.

There is no such evidence in this application.

#### Preventing gambling being a source of crime and disorder

The comments above show that gambling is a serious issue for children and vulnerable people.

There is nothing in this application to suggest that this company is willing to recognise that and placing the adult gambling venue in a playground for children does the exact opposite of what the legislation requires.

#### Public safety and prevention of public nuisance

The applicant has not attached a local area risk assessment<sup>9</sup>. The IOWCC requires this and states:

*7.11<sup>10</sup> Whilst the Licensing Authority does not seek to repeat the LCCP, it will need to be satisfied on a number of issues. From 6 April 2016 it will be a requirement for operators to assess local risks to the licensing objectives taking into account this Council's Policy. The operator must also have policies, procedures and control measures in place to mitigate these risks. Risk assessments must be reviewed whenever there are significant changes in local circumstances, or at the premises, or when applying for a new licence or a variation of the licence. Risks in this context include actual, potential and possible future emerging risks to the licensing objectives<sup>11</sup>.*

The IOWCC states further<sup>12</sup> that:

7.12 The Licensing Authority will expect the local risk assessment to consider, for example;

- whether the premises **is in an area of deprivation**
- whether the premises is in an area subject to high levels of crime and/or disorder
- whether the premises is near an addiction treatment facility and in general consider the **demographics of the area in relation to vulnerable groups**
- the location of sensitive buildings such as schools, **playgrounds**, toy shops, leisure centres, libraries **and other areas where children are likely to gather**, and
- how **vulnerable persons as defined within this policy are protected**.

There is no such risk assessment with this application, showing a complete disregard for the requirements of the legislation and local policy based on that legislation.

Our comments above show our concerns about public safety in terms of risk to children at the funfair and to vulnerable adults living in a socially deprived area. We recommend refusal.

Stella Davis  
Chair  
The Ryde Society

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<sup>9</sup> Part 5, section 20 of application omitted.

<sup>10</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf>

<sup>11</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf> 7.11

<sup>12</sup> <https://www.iow.gov.uk/azservices/documents/1878-Gambling-Policy-19-22-Approved.pdf> 7.12

From: **Lilley, Michael - IW Councillor for Ryde East and Mayor of Ryde**

Sent: 20 February 2020 10:33

To: Licensing <[licensing@iow.gov.uk](mailto:licensing@iow.gov.uk)>

Subject: Fwd: Licensing objection - 20/00148/GAAGCN/GA05

Dear Licensing,

I am emailing/writing to strongly object to the application for adult gaming machines in premises opposite the Harbour. I am objecting as a Ryde IW and Town Councillor and as the current Mayor of Ryde.

Ryde Town Council has recently approved a Ryde Place Plan as part of regeneration of the Town and approved to the acquisition of the Harbour/Marina from Isle of Wight Council.

RTC has a vision for the Harbour area to really develop as a family-friendly community, leisure and tourism destination. It is already a place that attracts many families with children of all ages. The Harbour itself is used by families to catch crabs, view the boats coming back and forth, and a place to enjoy the views across the channel. RTC plan to develop a range of water-sport and beach activities to increase footfall as a place of leisure and tourism. The Harbour area includes already a range of child based activities such as slides and rides. Eastern Gardens has throughout the summer family friendly events and the Ryde Skatepark for young people is nearby. There is a children's playground near to the proposed location of the gaming machines. This area is totally targeted to families with children. It is totally unacceptable for adult gaming machines to be placed within this context. It would be detrimental to the ambience and character of this family friendly safe area. I totally object to this application on these grounds alone.

However, I also object to gaming machines in this area on the grounds of the psychological damage and the financial harm such gaming machines reap on the individuals that use them. There is clear evidence that slot machines are not only the most popular forms of gambling worldwide, but they are also the form most consistently linked to gaming addiction.

As a retired Counselling Psychologist, and one that work with many patients addicted to gaming machines, I have a particular knowledge of how they lead to severe damaging addiction and in some cases loss of life through suicide. My many years of observation, I concluded that having gaming machines in easy access on seaside fronts in a family friendly atmosphere are often the starting point of the addiction.

Slot machines are preferred by problem gamblers because of the fast, continuous style of play brings about an immersed state in which players can escape from feelings of stress, boredom and low mood. They quickly become obsessed and start suicidal ideation when they loose continuously. Evidence shows that low income individuals and those with a mental illness diagnosis are particularly attracted as it provides the illusion that their luck may change and they will in an instance fix change their lives. This is an illusion. It has to be noted the Harbour area is located in one of the Island's most deprived wards and one that has a high number of adults with mental health issues. Ryde is the highest area of suicide attempts on the IW and has the highest suicides.

I am particularly concerned about these kind of gaming machines attracting adults and young people with an autism diagnosis (especially high performing autism such as Asperger's). The IW has a higher percentage of those diagnosed with autism than other areas of the South-East. These individuals are particularly vulnerable as they get addicted to the rationale they can through systems of counting can beat the machines.

Evidence shows that once addicted, gaming addicts have great difficulty to stop and their families often experience extreme financial hardship.

I urge the Licensing Committee to seek expertise advice from NHS Mental Health Services and Public Health about gaming addiction before coming to any decision and consider the unsuitability of putting such machines within a family friendly environment.

## **Ryde Town Council**

Ryde Town Council discussed the License application GA05 New AGC and agreed that RTC's main concern is that the gaming area would be located within a facility that is designed for families and, in particular, children. We consider it inappropriate to have an adult gaming area in such a location.'

RTC decided to object to the License as it was contrary to the following licensing objectives under the Gambling Act 2005:

### ***1. Protecting children and other vulnerable persons from being harmed or exploited by gambling.***

The application is for an adult gaming area, the difference between this and the normal low pay out machines is that there is a high level of addiction to gambling associated with these high cost, high pay out machines.

The proposal includes minimal segregation by way of swing doors and half height glazed partitions to keep children away from the gambling area. Children are drawn to the sort of lighting that is synonymous with gaming machines and will have full view of adults feeding them. This will have the effect of normalising gambling and familiarising young children to the idea of gambling.

In addition, this type of gambling is likely to bring adults who deal in drugs, abuse drink and practice anti-social behaviour into contact with young children and give them the opportunity to influence them.

### ***2. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.***

Ryde Town Council consider that this application for a new gambling facility in this area may well encourage gambling being "*associated with crime or disorder.*"

The Council felt that, given the existing incidents on the Esplanade of drug and drink abuse and anti-social behaviour, the introduction of high pay out gambling machines in the area would further exacerbate the problem.